

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

BOWEN, MICLETTE & BRITT  
INSURANCE AGENCY, LLC,

Plaintiff,

v.

ALLIANT INSURANCE SERVICES,  
INC.,

Defendant.

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C.A. No. 4:15-cv-01112

JURY DEMANDED

**DECLARATION OF RACHEL STEELY**

I, Rachel Steely, am over twenty-one years of age and hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Attorney of Record for Defendant Alliant Insurance Services, Inc. I have personal knowledge of the facts set forth herein.

2. On Monday, July 14, 2015, I confirmed with Plaintiff's counsel that the deposition of Ted Filley would be conducted in San Diego, California on Friday, July 17. I arranged for the deposition meeting space. Mr. Helfand confirmed he was not in trial on July 17, 2015 and would not be going to trial until July 24, 2015 in Judge Hittner's court.

3. On Wednesday, July 15, 2015, I traveled to San Diego for the Filley deposition. After I arrived I received a letter from Mr. Helfand cancelling the

**EXHIBIT G**

deposition. He stated he was not able to attend due to a funeral. The funeral was held at 11:00 a.m. on Friday, July 17.

4. I expressed to Mr. Helfand that we could not proceed with the deposition on August 3 because I had a commitment in another case with multiple parties and that if he wanted the deposition on or before August 3, he would need to have another attorney conduct the deposition while I was in San Diego. I never heard back from Plaintiff's counsel during that week. Alliant and Mr. Filley were ready to appear in person or via video for the deposition on July 16, July 17 and on July 18.

5. Alliant incurred \$1,447.65 in costs for the court ordered cancelled deposition from Wednesday July 15 through Friday, July 17.

6. I spent approximately 12 hours of travel time for the cancelled court ordered deposition. My rate is \$515 an hour. The amount of travel time alone exceeded \$6,000. These expenses will be incurred again when I have to return for a second time to attend the Filley deposition.

Executed this 30th day of July, 2015.

  
RACHEL STEEDY